

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and for the Chapter 7 Estate
of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

KATZ GROUP LIMITED PARTNERSHIP, a
Wyoming limited partnership, KFI, INC., a
Wyoming corporation,

Defendants.

Adv. Pro. No. 10-04419 (SMB)

STIPULATION FOR ENTRY OF FINAL JUDGMENT ON CONSENT

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff Irving H. Picard (the “Trustee”), as the trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa–III, substantively consolidated with the liquidation under chapter 7 of the Bankruptcy Code 11 U.S.C. §§ 101–1532 of the estate of Bernard L. Madoff, and Katz Group Limited Partnership and KFI, Inc. (together, “Defendants” and collectively with the Trustee, the “Parties”), as follows:

1. That Defendants, represented by counsel, have read and understand the contents of this Stipulation for Entry of Final Judgment on Consent (this “Stipulation”);
2. That this Stipulation shall be filed immediately upon execution;
3. That on or about May 26, 2020, the Parties entered into a settlement agreement and release (the “Settlement Agreement”) and pursuant to the terms of the Settlement Agreement, the Trustee is entitled to immediate entry of the Final Judgment, a copy of which is attached hereto as Exhibit 1, entered against the Defendants, in the amount of Seven Million One Hundred Twenty-One Thousand One Hundred Nineteen United States Dollars and Six Cents (\$7,121,119.06).
4. That Defendants confirm the amount set forth in Paragraph 3 above.
5. That Defendants consent to the jurisdiction of the Bankruptcy Court for all purposes, including entry of Final Judgment.
6. That judgment shall be final for all purposes upon entry of judgment and the Parties waive any right to appeal therefrom.
7. That the Final Judgment shall not bear interest beyond the calculated pre-judgment interest on the Avoidable Transfers at the rate of 9% per annum, or \$946.41 daily, pursuant to N.Y. C.P.L.R. § 5004, from Nov. 30, 2010 through May 26, 2020, in the amount of \$3,280,257.06.

8. That Defendants expressly waive notice of entry of judgment and notice of and right to any hearing regarding entry of judgment.

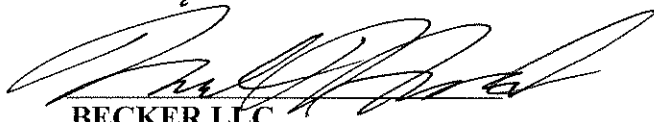
9. This Stipulation may be signed in counterparts, all of which taken together shall constitute the agreement of the Parties hereto. A photocopy, facsimile, or email signature to this Stipulation shall be deemed as an original signature for any and all purposes.

10. This Stipulation is defined and limited as set forth herein and by the terms of the Settlement Agreement.

11. That the Bankruptcy Court shall retain jurisdiction over the Parties to enforce this Stipulation until there is full performance of the terms hereof

Dated: New York, New York

5/29, 2020



BECKER LLC

354 Eisenhower Parkway
Suite 1500
Livingston, New Jersey 07039
Telephone: (973) 422-1100
Facsimile: (973) 422-9122
Michael E. Holzapfel, Esq.
Email: meholzapfel@becker.legal

*Attorneys for Defendants Katz
Group Limited Partnership and
KFI, Inc.*

/s/ Nicholas J. Cremona

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Maximillian S. Shifrin
Email: mshifrin@bakerlaw.com
Tara E. Turner
Email: tturner@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the
Chapter 7 Estate of Bernard L. Madoff*